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November 21, 2022

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Shinano Kenshi Corp. et al. v. Honeywell Int'l Inc.*, Case No. 22 CV 3704 (LGS)

Dear Judge Schofield:

Pursuant to the Court's Letter Order dated November 14, 2022 (Dkt. No. 34), Plaintiffs Shinano Kenshi Corporation and Shinano Kenshi Co., Ltd. (collectively referred to as "Plaintiff") and Defendant Honeywell International Inc. ("Defendant"), respectfully submit this joint letter to update the Court regarding deposition scheduling.

Both parties have circulated the names of deponents on their respective sides who they believe have information most relevant to the parties' dispute and offered deposition dates for those persons. The roles of each of the persons has been outlined in the parties' respective initial disclosures and subsequent discovery responses. Both parties have also requested dates for the depositions of persons that they wish to depose and intend to meet and confer regarding those depositions to the extent the names do not fully overlap with those persons for whom dates have been provided. Finally, the parties intend to further meet and confer to finalize dates, locations for the depositions, and whether the depositions will be conducted remotely or in person.

To the extent the parties do not reach an understanding on those and certain other discovery issues, they will raise these disputes in a joint letter by December 9, 2022, as they interpret the Court's November 14 letter to require.

We thank the Court for its attention to these matters.

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Respectfully Submitted,

DAVIS WRIGHT TREMAINE LLP

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